

Federal Defenders OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

June 7, 2021

BY ECF

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: United States v. Souleymane Balde
20 Cr. 281 (KPF)

Dear Judge Failla,

I respectfully write on behalf of my client, Souleymane Balde, to request that Mr. Balde's bail be modified from home detention to curfew. The hours of Mr. Balde's curfew will be set at the discretion of pre-trial services (PTS). When Mr. Balde was first released, on May 5th, 2020, he was placed on home incarceration. On November 12th, 2020, Mr Balde's bail was modified from home incarceration to home detention. Throughout this entire process, Mr. Balde has been extremely communicative with his PTS officer, Bernisa Mejia, and been in full compliance with her instructions. After this year of lockdown, as New York City re-opens, Mr. Balde hopes to spend some time outside with his daughter. More than anything, he hopes to be able to take his daughter for ice cream when she hears the ice cream truck outside. The government has no objection and PTS consents to this modification.

On May 5th, 2020, the following bail conditions were set for for Mr. Balde: 1. Prior to his release, defendant must sign a personal recognizance bond in the amount of \$75,000, to be co-signed by two financially responsible persons. 2. Defendant is subject to strict Pretrial supervision. Subsequently, your honor modified Mr. Balde's bail to home detention, instead of home incarceration. Over the last several months, Mr. Balde has obeyed all the rules set forth by Ms. Mejia, and stayed in constant communication with her.

Respectfully submitted,
/s/
Jennifer E. Willis
Assistant Federal Defender

cc: All counsel on record (ECF)
Bernisa Mejia (PTSO)

Application GRANTED.

Dated: June 7, 2021
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE